

# **Exhibit G**

**From:** [Patrick Trainor, Esq.](#)  
**To:** [Starbuck, Emily](#)  
**Cc:** [Mulherin, Joseph](#)  
**Subject:** RE: D'Ambly - Electronic discovery parameters  
**Date:** Thursday, December 15, 2022 4:16:08 PM  
**Attachments:** [image001.png](#)  
[Exoo Threat.mp4](#)

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**[ External Email ]**

Joe & Emily. I will respond more thoroughly tomorrow.

For Christ's sake would you stop the nonsense. This is my lightweight Gen Z stuff, save your objections. Better yet, why don't you just tell me how many hours you have allocated for this case, and I will drop a bunch of motions that require your response, so we can eat up all of those hours and get to the meat of this.

The selected search terms I supplied are a curated list of obvious word choices, and quotes from Tweets that were sent directly to the Tribune and the Daily News by persons calling for D'Ambly's termination and union expulsion. Let me show two real quick, so you know I am not half-assing it. Lines 72 & 73 of the search term spreadsheet read Oren Segal and "Oren Segal." This is a person who stalked D'Ambly and I have on good authority was in contact with your staff demanding D'Ambly's termination. See Tweet screenshot below on the left with D'Ambly in the photograph. By the way, Oren Segal testified in front of Congress yesterday when this man made a fool of himself. See here <https://www.youtube.com/watch?v=3qoPgeWp5eg>

Secondly, line 68 from the spreadsheet that reads "they kick puppies" is a quote taken directly from the tweet to the Daily News from the person who left the attached voicemail message at the Tribune on January 11, 2019, see below right. Are you going to tell me you can't find this? Are you seriously telling me that "nazi, fascist, and white supremacist" and their derivatives are overly broad search terms when that is the basis of D'Ambly's termination.

Moreover, read that half-assed investigative report your client commissioned, and you will find my reasoning for the others. Further @slpng\_giants is an organization, who at the relevant time was run by a vile racist immigrant from India, who exploited affirmative action and other systemically racist government discrimination programs to get ahead.



Sincerely,

Patrick Trainor, Esq.

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**From:** Starbuck, Emily <Estarbuck@mwe.com>

**Sent:** Thursday, December 15, 2022 4:35 PM

**To:** Patrick Trainor, Esq. <pt@PTESQ.COM>

**Cc:** Mulherin, Joseph <Jmulherin@mwe.com>

**Subject:** RE: D'Ambly - Electronic discovery parameters